

## EXHIBIT G

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January 10, 2008

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Re: Neurontin Litigation  
Deposition of Smith-Weiss, Ph.D.

Dear Counsel:

As you know, Dr. Smith-Weiss's deposition concluded yesterday. Let me take this opportunity to address certain discovery issues related to her deposition. I would ask that you make yourself available to confer with me as soon as is practical.

First, during her testimony, the witness identified her use of software via a company, DrugLogic, for purposes of calculating a Proportional Reporting Ratio (PRR). Essentially, data regarding adverse events is accumulated via DrugLogic's QScan software. A disc including some but not all of the data involved in her calculation of a PRR was provided to Plaintiffs' counsel. Further, she represented she would not provide us with the software to replicate her analysis because her contract with DrugLogic precluded same. Consequently, we do not have the complete data that your expert possessed in reaching her opinion and we do not have the software she utilized. Rather than argue the merits of whether she was obligated to provide the complete data or the software at the deposition, consider the following resolution: the parties agree to meet with Dr. Smith-Weiss, presumably at her office where the software and data is available, for purposes of a discovery-inspection of the software and data. At such time, the parties can verify and replicate their respective data applications on the QScan software possessed by the witness (or to which she has a subscription for use online).

Second, the witness did not bring with her any documents pertaining to her billing practices related to his litigation. You have consistently pursued such billing/accounting records from our experts, and so I would expect that such documents would have been disclosed; please disclose these documents immediately. I expect that the issue can be resolved when we ultimately resolve your issues with plaintiff expert Dr. Blume's disclosure and the records you have sought from her.

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Third, I was concerned and frankly shocked that you did not require your witness to sign the confidentiality agreement (protective order) that is in effect in this litigation. I am hopeful that this situation is an aberration, and I would ask that you advise me of any other such circumstances about which you are aware.

I look forward to speaking with you regarding these matters.

Very truly,



Kenneth B. Fromson  
845-562-0203 x2755

cc Jim Rouhandeh (Davis Polk & Wardwell)